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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

ALICIA INES MOYA GARAY, JUAN  
JAIME LOPEZ-JIMENEZ, and ARRIBA  
LAS VEGAS WORKER CENTER,

Plaintiffs,

vs.

CITY OF LAS VEGAS, UNITED  
STATES IMMIGRATION AND  
CUSTOMS ENFORCEMENT, et al.,

Defendants.

Case No.: 2:20-cv-00119-GMN-EJY

**STIPULATION AND ~~PROPOSED~~ ORDER  
TO EXTEND SCHEDULING DEADLINES**

**(FIRST REQUEST)**

**STIPULATION AND [PROPOSED] ORDER TO EXTEND SCHEDULING DEADLINES**

Under LR IA 6-1 and LR 26-3, the Parties, by and through their respective counsel of record, stipulate and request that this Court extend the Scheduling Deadlines in the above-captioned case. Plaintiffs Alicia Ines Moya Garay, Juan Jaime Lopez-Jimenez, and Arriba Las Vegas Worker Center (“Plaintiffs”) and Defendants City of Las Vegas, United States Immigration and Customs Enforcement, *et al.* (“Defendants”) stipulate and respectfully request a five-month extension of the current scheduling order deadlines. In support of this Stipulation and Request, the Parties state as follows:

**A. DISCOVERY COMPLETED TO DATE**

Plaintiffs Alicia Ines Moya Garay, Juan Jaime Lopez-Jimenez, and Arriba Las Vegas Worker Center (“Plaintiffs”) filed their Fourth Amended Complaint on November 5, 2024. Defendant United States Customs and Immigration Enforcement, *et al.* (“Federal Defendants”) filed a motion to dismiss Plaintiff’s Fourth Amended Complaint on December 17, 2024. Defendant City of Las Vegas, *et al.* (“City Defendants”) filed an answer to the Fourth Amended Complaint on December 17, 2024. Federal Defendants made their initial disclosures on February 4, 2025. City Defendants propounded their Second Set of Requests for Production of Documents and Interrogatories on June 5, 2025. The Court entered an order denying Federal Defendants’ motion to dismiss Plaintiffs’ Fourth Amended Complaint on June 13, 2025.

Plaintiffs have not amended their pleadings or added any parties to this action since filing their Fourth Amended Complaint. Further, none of the Parties have disclosed experts or rebuttal experts as specified in the Stipulated Discovery Plan and Scheduling Order [dkt. 141].

**B. DISCOVERY REMAINING TO BE COMPLETED**

The Parties in this case continue to propound and respond to written discovery, and must conduct depositions.

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**C. REASONS FOR REQUEST OF SCHEDULING DEADLINES**

The Parties seek an extension of the scheduling deadlines. An extension of dates and deadlines requires good and just cause. *See* LR 26-3. A party may show good cause to modify a schedule date “if it cannot reasonably be met despite the diligence of the party seeking the extension.” *See Johnson v. Mammoth Recreations, Inc.*, 975 F.2d 604, 609 (9th Cir. 1992). Prejudice to “the party opposing the modification” may also be relevant. *See id.*

Plaintiffs met and conferred with City Defendants and Federal Defendants, respectively, on June 17 and 18, 2025. Defendants do not oppose an extension of the scheduling deadlines. Plaintiffs understood that they were unable to conduct written discovery until the pending motion to dismiss was adjudicated, which occurred on June 13, 2025. Further, Federal Defendants believed that they should not be subject to discovery until the Court determined which, if any, claims Plaintiffs may assert against them, as well as questions concerning the organizational plaintiff’s standing.

Because of the pending motion to dismiss that was recently adjudicated and because Defendants do not oppose the request, the Parties demonstrate good and just cause for the extension. The Parties respectfully request a five-month extension of the current scheduling order deadlines in accordance the proposed scheduling order below.

**D. ~~PROPOSED~~ SCHEDULE FOR COMPLETING DISCOVERY**

1. Discovery Cut-Off Date	December 8, 2025
2. Dispositive Motions Due	January 23, 2026
3. All Other Motions Due	February 9, 2026
4. Pretrial Order	March 9, 2026
5. Pretrial Conference	March 26, 2026
6. Jury Trial (City Defendants) (estimated 2 weeks)	April 9, 2026
7. Bench Trial (Federal Defendants (estimated 2 weeks)	April 9, 2026

1 Dated: June 20, 2025

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3 **MEXICAN AMERICAN LEGAL DEFENSE**  
4 **AND EDUCATIONAL FUND**

5 /s/ Luis L. Lozada

6 Luis L. Lozada

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**U.S. DEPARTMENT OF JUSTICE**

Office of Immigration Litigation

/s/ Matthew P. Seamon

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18 **IT IS SO ORDERED.**

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21 UNITED STATES MAGISTRATE JUDGE

22 DATED: June 23, 2025